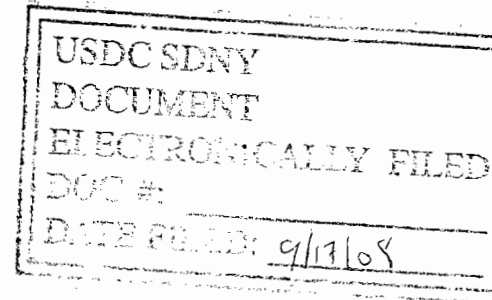


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X

IN RE LEHMAN BROTHERS HOLDINGS, INC. : Case No.: 07-CV-2990 (DAB/HBP)
DERIVATIVE LITIGATION : ECF Case

:
:
:
: ~~PROPOSED~~ ORDER OF STAY
:

-----X

Upon reading the foregoing Notice of Bankruptcy, it is this 17 day of September, 2008,
by the United States District Court for the Southern District of New York, ORDERED that the
above-captioned action is hereby stayed as against Lehman Brothers Holdings Inc. and the
proceedings shall be deferred to the Bankruptcy Court as stated in the Notice of Bankruptcy as to
the following Defendant:

LEHMAN BROTHERS HOLDINGS INC.
745 Seventh Avenue
New York, NY 10019

A handwritten signature in cursive script, reading "Deborah A. Batts".
Hon. Deborah A. Batts 9/17/08
United States District Judge